

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE

AIR CARGO SHIPPING SERVICES
ANTITRUST LITIGATION

MDL No. 1775

06-MD-1775 (JG) (VVP)

THIS DOCUMENT RELATES TO:
All Actions

**PLAINTIFFS' NOTICE OF MOTION AND MOTION TO AUTHORIZE
DISTRIBUTION OF THE AIR FRANCE-KLM, SAS, JAL, AMERICAN, ANA,
CARGOLUX, QANTAS, AND THAI SETTLEMENT FUNDS**

PLEASE TAKE NOTICE THAT, upon the Declaration of Jennifer M. Keough Re: Air Cargo 2 Settlement Claims Administration, dated April 16, 2012 ("Keough Declaration"), along with its supporting exhibits and the Memorandum in Support of Plaintiffs' Motion to Authorize Distribution of Air France-KLM, SAS, JAL, American, ANA, Cargolux, Qantas, and Thai Settlement Funds, and all other papers and proceedings here, Plaintiffs will move this Court on a date and time to be set by the Court, before the Honorable John Gleeson, United States District Judge, at the United States Courthouse, 225 Cadman Plaza East, Brooklyn, New York, pursuant to Rule 23 of the Federal Rules of Civil Procedure, to enter an order authorizing the distribution of settlement funds in accordance with Exhibit 3 to the Keough Declaration. Oral argument on this motion, if any, will be held on a date and time set by the Court.

Dated: April 16, 2012

Respectfully submitted,

Robert N. Kaplan (RK-3100)
Gregory K. Arenson (GA-2426)
KAPLAN FOX & KILSHEIMER LLP
850 Third Avenue, 14th Floor
New York, NY 10022
(212) 687-1980

Howard J. Sedran
Austin B. Cohen
LEVIN, FISHBEIN, SEDRAN
& BERMAN
510 Walnut Street
Philadelphia, PA 19106
(215) 592-1500

Gary L. Specks (GS-8767)
KAPLAN FOX & KILSHEIMER LLP
423 Sumac Road
Highland Park, IL 60035
(847) 831-1585

By: /s/ Howard J. Sedran

By: /s/ Robert N. Kaplan

Hollis L. Salzman (HS-5994)
Jay L. Himes (JH-7714)
Gregory S. Asciolla (GA-2222)
LABATON SUCHAROW LLP
140 Broadway
New York, NY 10005
(212) 907-0700

Michael D. Hausfeld
Brent W. Landau
Hilary K. Scherrer
HAUSFELD LLP
1700 K Street, N.W., Suite 650
Washington, DC 20006
(202) 540-7200

By: /s/ Hollis L. Salzman

By: /s/ Michael D. Hausfeld

Class Counsel